

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

AMF BOWLING CENTERS, INC.; §  
BOWLERO CORP. §  
§  
*Plaintiffs*, §  
§  
vs. § CIVIL ACTION NO. 3:23-cv-00448  
§  
THOMAS TANASE, §  
§  
*Defendant*. §

**PLAINTIFFS' AMENDED MOTION FOR SANCTIONS**

Plaintiffs AMF Bowling Centers, Inc. and Bowlero Corp. (collectively, “Bowlero” or the “Company”), for the reasons provided in the accompanying memorandum of law, respectfully move this Court to grant sanctions against Defendant Thomas Tanase (“Tanase”) by entering an order:

1. granting default judgment in Bowlero’s favor and against Tanase as to liability, or, alternatively, to preclude Tanase from further affirmative testimony in this matter;
2. granting Bowlero the opportunity to depose Tanase within seven (7) days from the date of the entry of this order, or as soon as possible thereafter as counsel may mutually agree, on the Originally Produced June 17 Recording, including to question Tanase about the circumstances under which such recording was modified; and
3. ordering Tanase to pay Bowlero’s attorneys’ fees and costs in connection with investigating the issues related to the manipulation of the Originally Produced June 17 Recording and preparing its initial and amended Motion for Sanctions, and supporting memoranda of law as well as for continuing to litigate the Amended Motion.

**Dated:** April 7, 2024

Respectfully submitted,

**AMF BOWLING CENTERS, INC.  
and BOWLERO CORP.**

*/s/ Neil S. Talegaonkar*

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*Counsel for Plaintiffs AMF Bowling Centers, Inc.  
and Bowlero Corp.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of April, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel for Defendant Thomas Tanase:

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*/s/ Neil S. Talegaonkar*

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